May 27, 2010 Project #: 1009644004 - 54

Mr. Mark Lewis
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Subject: Closure Plan Part 2 and Part 3 – Container Storage Area
Addendum to Remedial Action Plan – AOC 1, AOC 5, AOC 9 and AOC 14
Montville Generating Station
Montville, Connecticut

Dear Mr. Lewis:

On behalf of Montville Power LLC and their parent company NRG Energy, Inc. (NRG), Shaw Environmental, Inc. (Shaw) has prepared this Closure Plan Part 2 and Part 3 for the Container Storage Area (CSA) at the subject site. Closure of the CSA was originally detailed in a Remedial Action Plan (RAP) prepared by Shaw and dated June 17, 2009 and for which public notice activities were completed on August 3, 2009. The Connecticut Department of Environmental Protection (CTDEP) and Environmental Protection Agency (EPA) had previously indicated that the CSA could be closed under the RAP. During a meeting on September 3, 2009 attended by NRG, CTDEP, EPA, and Shaw, it was agreed to that a brief RAP addendum would be prepared to address any needed specifics to close the CSA and that CTDEP would provide timely review and approval of the addendum. The Addendum RAP - Closure Plan Part 1 (CPP 1) prepared by Shaw on November 23, 2009 was approved by the CTDEP in a concurrence letter dated December 17, 2009. The CPP 1, and this CPP 2 and CPP 3 follow the "Draft RCRA Closure Plan Guidance for Treatment Storage and Disposal Facilities, Container Storage Areas, and Tank Systems" prepared by CTDEP dated November 1993. NRG requests that NRG please review and approve this document by July 1, 2010.

The CSA at the subject site is located in the basement level of waste water treatment building (extending approximately 5-feet below grade) in the middle of the site (**Figure 1**). The CSA was historically utilized as a RCRA storage area for drums containing hazardous wastes prior to shipment off site. RCRA wastes have not been stored in the CSA in over two years. The CSA consists of a 37.5-foot by 8.5-foot indoor storage facility with concrete secondary containment which has a storage capacity of 48, 55-gallon drums. A sketch of the CSA is provided as **Figure 2**. There have been no recorded spills or releases at the CSA.

CLOSURE PLAN PART 2: RESULTS OF SITE CHARACTERIZATION PROGRAM AND PROPOSED CLOSURE APPROACH

I. Site Characterization Work Plan and Analysis Results

CSA Cleaning and Concrete Chip Sampling

As proposed in CPP 1, the floor and secondary containment inside of the CSA was steam cleaned, and the wash water was collected by a wet/dry vacuum cleaner on February 9, 2010. The wash water was drummed, and a sample of the drummed water was collected for waste characterization. The waste characterization sample was analyzed for the following: volatile organic compounds (VOCs), semi-volaitle organic compounds (SVOCs), extractable petroleum hydrocarbons (ETPH), 13 priority pollutant metals (PPM), polychlorinated biphenyls (PCBs), reactivity, corrosivity, and ignitability. The following compounds were detected in the wash water:

- Acetone
- Chloroform
- Butyl benzyl phthalate
- Di-n-butyl phthalate
- Diethyl phthalate
- Dimethyl phthalate
- Bis(2-Ethylhexyl) phthalate
- ETPH
- PCB Aroclor 1260
- Antimony
- Arsenic
- Beryllium
- Cadmium
- Chromium
- Copper
- Lead
- Mercury
- Nickel
- Selenium
- Silver
- Thallium
- Vanadium
- Zinc

The laboratory analytical report is included as **Attachment 1**. The drum of wash water is currently pending transport and disposal.

Following the cleaning, the concrete floor was thoroughly inspected for cracks and potential staining. The following observations were made during the inspection:

1. Surficial hairline cracks (<1/16" wide) were identified throughout the concrete floor of the CSA.
2. A patch in the concrete floor was identified on the east side of the CSA adjacent to the cut capped piping. The patch in the concrete is a possible former pipe location. Note the cut capped piping was identified during the March 25, 2009 inspection, the destination and use of the capped pipe is unknown, and the capped pipe vertically penetrates into but not necessarily through the concrete slab floor.

3. Mineral staining from water on the floor was noted along the west side of the CSA (also noted during the March 25, 2009 inspection).
4. Iron stained and chipped concrete were noted in the concrete floor in the southeast portion of the CSA (chipped concrete and spalling of the floor was also noted during the March 25, 2009 inspection).

The observations noted above are detailed in **Figure 2,** and photographs of the CSA are provided attached as **Attachment 2**.

On February 9, 2010, Shaw collected four concrete chip samples from the floor of the CSA (CSA Chip 1 through CSA Chip 4) to assess the potential of a release in the CSA. In addition, two background samples (Background Chip 1 and Background Chip 2) were collected approximately 25-feet north of the CSA to assess background conditions in the concrete floor. The chip sample locations in the CSA were based on a regular pattern as proposed in the CPP 1 (approximately one sample/70 square feet) but were also located to assess suspect areas (e.g., location with cracks or staining). The concrete samples were collected from a depth of 0 to 6-inches. The samples were analyzed for the complete Contaminant of Concern (COC) list generated for the CSA as described in the CPP 1. The COC list includes SVOC acid, base and neutral list by EPA Method 8270 [mass and synthetic precipitation leaching procedure, (SPLP)], VOCs by EPA 8260, 13 priority pollutant metals by EPA 6000/7000 (mass and SPLP), ETPH, and PCBs by EPA Method 8082. The concrete chip sample locations are illustrated on **Figure 2**.

The following compounds were detected in the CSA concrete chip and background concrete chip samples as shown on the attached table (**Attachment 3 - Table 1**).

- 2-Butanone (background only)
- Benzene
- Carbondisulfide
- Toluene
- Di-n-butylphthalate
- Isophorone
- Phenol
- SPLP Butyl benzyl phthalate
- SPLP Phenol (background only)
- Antimony
- Arsenic
- Beryllium
- Cadmium (background only)
- Chromium (mass & SPLP)
- Copper (mass & SPLP)
- Lead
- Mercury
- Nickel (mass & SPLP)
- Vanadium (mass & SPLP)
- Zinc
- ETPH

With the exception of 2- butanone, SPLP phenol, mass cadmium, mass copper, mass nickel, mass vanadium, SPLP chromium, and SPLP nickel, detected compounds in the concrete chip samples exceed the results of “background” samples as shown on **Table 1**. A comparison of the laboratory results for the concrete chip samples to the Media Closure Criteria (MCC) is provided on **Table 1**. The MCC are the

most applicable of the three Connecticut Remediation Standard Regulations (CT RSRs) criteria: Residential Direct Exposure Criteria (Res DEC), Industrial/Commercial Direct Exposure Criteria (I/C DEC), and the GB Pollutant Mobility Criteria (GB PMC). Use of the RSR criteria as MCC is consistent with CTDEP guidance. As illustrated in **Table 1**, detected compounds in the concrete chip samples were well below applicable RSR criteria. Detected VOC concentrations were at least three orders of magnitude below the GB PMC (lowest standard). Detected total metal concentrations were one to four orders of magnitude below Res DEC (lowest standard). Detected SPLP metal concentrations were one to four orders of magnitude below GB PMC (applicable standard). Detect total SVOC results were four orders of magnitude below GB PMC (lowest standard). Detected SPLP SVOC results were four orders of magnitude below the GB PMC (applicable standard). Detected ETPH concentrations were one order of magnitude below Res DEC (lowest standard).

A Shaw data validator completed an evaluation of the concrete chip data and associated QA/QC information included in the laboratory report. Based on the evaluation, some of the concrete chip sample results were qualified; however, the identified QA/QC issues had no overall effect on the conclusions drawn from the data, and the data are acceptable for the purposes of this submittal. A form that summarizes the evaluation completed by the validator is included with the laboratory analytical report as **Attachment 1**. The following summarizes the issues identified and the qualifiers applied to the data:

- The VOC result for Background Chip 1 sample were qualified as estimated "J" or non-detect estimated "UJ" due to a high surrogate recovery outside control limits and low internal standard area count.
- The SVOC results for CSA Chip 2, CSA Chip 4, Background Chip 1, Background Chip 2 and CSA Chip Dupe were qualified as estimated "J" or non-detect estimated "UJ" due to low surrogate recoveries outside control limits.
- Select SVOC compounds for CSA Chip 1 and CSA Chip 2 were qualified as non-detect estimated "UJ" due to low matrix spike and matrix spike duplicate recoveries outside control limits; and select SPLP SVOC compounds for CSA Chip Dupe were qualified as non-detect estimated "UJ" due to low matrix spike and matrix spike duplicate recoveries outside control limits.
- The following SVOCs were detected in the method blank: butyl benzyl phthalate, di-n-butyl phthalate and bis (2-ethyl hexyl) phthalate. These compounds were qualified non-detect "U" for samples where the results were less than 5 or 10 times the amount found in the blank.
- Acetone, was detected in the method blank, and was qualified non-detect "U" for the associated samples.
- Blank Spike recoveries for various SVOC compounds were outside control limits due to low percent recoveries, and the results for these compounds were qualified non-detect estimated "UJ".

Subslab Soil Sampling

On February 23, 2010, Shaw attempted to advance shallow soil borings through the concrete floor of the CSA. However, as the coring was advanced, it was discovered that the concrete slab thickness was greater than 3-feet, and a larger concrete core machine was required to completely core through the floor. Shaw retuned on March 23, 2010 with appropriate equipment and advanced a core and boring adjacent to the capped pipe in the southeast portion of the CSA area (see **Figure 2** for boring location, AOC14-SB1). This location was selected as a sampling location because the capped pipe presented the only known potential migration pathway through the concrete floor slab. Based on the coring, the concrete floor slab was determined to be 4-feet thick and the concrete consisted of solid, aggregate concrete with metal rebar present at approximately 5-inches and at 32-inches from the concrete slab surface. The first 36-inches of the concrete floor slab were a continuous concrete slab and were underline by a second 12-

inch thick continuous concrete slab. No fractures, cracks or fissures were noted in the concrete core upon inspection.

Following the coring, a soil sample was collected from 0 to 6-inches below the concrete slab using a hand auger. The soil encountered appeared to be fill material consisting of brown, saturated, loose, fine to coarse sand, and fine gravel. Groundwater was encountered beneath the concrete slab floor. The soil collected was screened for vapor organic compounds via a photoionization detector (PID) calibrated to 100 parts per million isobutylene standard. Soil screening with the PID did not indicate detectable levels of VOCs. In addition, there were no visual or olfactory evidence of a release from the CSA identified in the soil. The soil boring log is attached as **Attachment 4**.

Based on the thickness of the slab, the sound integrity of the concrete, the absence of penetrating cracks in the slab, and the absence of impacted soil (based on visual inspection and PID screening), additional borings at the additionally proposed locations were not advanced. Furthermore, these observations illustrated that deeper soil samples at A14-SB1 were not warranted.

The soil sample collected at A14-SB1 was analyzed for the complete COC list established in the CPP 1 as a conservative measure and because of the potential migration pathway of the capped pipe as described above.

Analytical results of the soil sample collected at A14-SB1 indicated the presence of the following: one VOC, carbondisulfide, 19 SVOCs (including 15 PAH compounds, bis(2-ethylhexl)phthalate, carbazole, dibenzofuran, and di-n-butyl phthalate), 10 of 14 metals analyzed (including arsenic, beryllium, chromium, copper, lead, nickel, selenium, silver, vanadium and zinc), and ETPH. PCB results in this soil sample were below detection limits. The soil analytical data table is included as **Attachment 3** -**Table 2**, and the Laboratory Analytical report is included as **Attachment 5.**

A Shaw data validator completed an evaluation of the soil data and associated QA/QC information included in the laboratory report. Some QA/QC issues were noted, but the identified issues had no overall effect on the conclusions drawn from the data, and the data are acceptable for the purposes of this submittal. A form that summarizes the evaluation completed by the validator is included with the laboratory analytical report as **Attachment 5**. The following summarizes the issues identified and the qualifiers applied to the data:

- Positive VOC results were qualified as estimated “J” due to surrogate recoveries outside control limits.
- The results for the SVOC, hexachlorocylcopentadiene, were qualified as non-detect estimated “UJ” due to low percent recoveries in the laboratory control sample/laboratory control sample duplicate (LCS/LCSD), spike blank and matrix spike/matrix spike duplicate (MS/MSD) spike blank.
- SVOCs butyl benzyl phthalate and di-n-butyl phthalate were qualified non-detect “U” due to positive detections in the method blank.
- Due to low recovery for one of the internal standards, select VOC compounds were qualified non-detect estimated “UJ”.

Laboratory analytical results were compared to the MCC in **Table 2**. This comparison indicated that detected compounds were well below the MCC with the exception of total arsenic. The detected total arsenic concentrations of 12.9 and 16.9 milligrams per kilogram (mg/kg) exceeded the MCC of 10 mg/kg

(Res DEC and I/ DEC standard). Other total metal concentrations were up to three orders of magnitude below Res DEC (lowest standards). Detected SPLP metal concentrations were three to four orders of magnitude below GB PMC (applicable standard). The one detected VOC concentration was four orders of magnitude below GB PMC (lowest standards). Detected ETPH concentrations were one order of magnitude below Res Dec (lowest standard). Detected total SVOC results were one to three orders of magnitude below GB PMC (lowest standard). Detected SPLP SVOC results were one to three orders of magnitude below the GB PMC (applicable standard).

Conclusion

The detected concentrations of ETPH, SVOCs, VOCs and metals in the concrete chip samples from the concrete slab floor are below the MCC. Based upon no recorded spills or documented releases in the CSA, the low detected concentrations in the concrete chip samples, and no sign of staining of the concrete, it does not appear that a release to the CSA concrete has occurred.

The CSA concrete slab floor is 4-feet thick with no fractures, cracks or fissures. However, there was one identified potential migration pathway in the CSA concrete slab floor, a capped pipe that vertically penetrates into but not necessarily through the concrete slab floor. There was no visual or olfactory evidence of impact in the sub-slab soil, and there were no detectable levels of VOCs from the soil screening. Analytical results of the soil sample collected beneath the CSA concrete slab floor were below the MCC with the exception of arsenic. Although the detected arsenic concentration in the sub-slab soil exceeds the MCC, this concentration is similar to the arsenic concentrations observed throughout AOC 12. The average arsenic concentration noted in the 43 soil samples collected in AOC 12 was approximately 22 mg/kg (see **Table 3**) compared to 12.9 and 16.9 mg/kg detected in soil beneath the CSA (see **Table 2**). In addition, the concentrations of detected compounds in soil within the CSA area are generally lower compared to the surrounding soil in AOC 12. The CSA is completely encompassed by AOC 12 - Former Coal and Coal Ash Handling Area as shown on **Figure 1**. AOC 12 occupies the majority of the east portion of the site and includes impacts from miscellaneous residual coal and coal ash due to former coal and coal ash use, storage and handling activities.

As shown in **Table 3**, the compounds detected in the CSA soil samples are the same compounds detected in AOC 12 with the exception of carbon disulfide, carbazole, dibenzofuran, di-n-butylphthalate, and vanadium. The positive detections of these compounds are at very low concentrations (low part-per-billion for the organic compounds and low part-per-million for vanadium). The detections of these compounds do not indicate a release from the CSA based on the following:

- Carbon disulfide is related to coal and coal ash. Carbon disulfide can form from coal residues under anoxic conditions. Coal is attributed to AOC 12 and not a release from the CSA. In addition, carbon disulfide was also detected in the concrete chip samples and one background chip sample at similar low concentrations, which provides an additional line of evidence that there was no release in the CSA since carbon disulfide is present in the background sample.

- Carbazole is an organic heterocyclic compound used as an intermediate in synthesis of pharmaceuticals, agrochemicals, dyes, and pigments. There is no record of storage of these types of materials in the CSA, and therefore, no release from the CSA.

- Dibenzofuran is also related to coal and coal ash. Dibenzofuran is a PAH compound. PAH compounds are significant constituents of coal ash. Coal ash is attributed to AOC 12 and not a release from the CSA.

- Di-n-butylphthalate was detected in one concrete chip sample and the soil sample. The di-n-butylphthalate concentrations for the concrete chip sample (mass result) and soil sample (SPLP result) were qualified with a "B" due to the detection in the laboratory method blank, which provides an additional line of evidence that there was no release in the CSA. Phthalates are common lab contaminants.

- Vanadium is also related to coal and coal ash. Vanadium is a significant constituent of coal ash, so its detection is not unexpected. Coal ash is attributed to AOC 12 and not a release from the CSA. In addition, vanadium was also detected in the concrete chip samples and both background chip samples at similar low concentrations, which provides an additional line of evidence that there was no release in the CSA since vanadium is present in the background sample.

It is likely that the arsenic and other compounds present in soil beneath the CSA (with the exception of di-n-butyl-phthalate which was detected in the method blank and carbazole which was not stored at the CSA) are attributable to releases at AOC 12 and not attributed to a release from the CSA. Remediation of AOC 12 and other AOCs at the site is being addressed under the Connecticut Transfer Act Program.

Based upon no recorded spills or documented releases in the CSA, the low levels of COCs present in concrete from the CSA floor, the thickness and sound integrity of the concrete slab floor, the lack of visual or olfactory evidence of impact in the concrete or the sub-slab soil, and the analytical results of the sub-slab soil sample, no release has occurred, remediation in the CSA is not warranted, and Clean Closure of the CSA can be achieved.

II. Proposed Closure Approach

NRG and Shaw propose a clean closure of the subject CSA because the concrete slab floor and surrounding and underlying soils were not impacted by a release from the regulated unit.

III. Departures from Site Characterization Work Plan

Departures from the site characterization work plan include the total number of CSA borings advanced and the depth of the soil sample collected at the CSA. As mentioned above, Shaw had proposed to install up to four soil borings and soil samples to a maximum depth of 5 feet below the concrete slab. However, due to the thickness of the slab (four feet), the sound integrity of the slab, the absence of penetrating cracks in the slab, and the absence of impacted soil beneath the concrete (based on visual inspection and PID screening), additional and deeper soil samples in the CSA were not warranted.

CLOSURE PLAN PART 3: REMEDIATION, VERIFICATION, QA/QC, CERTIFICATION

I. Closure Performance Standard

As discussed, the CSA is located within the wastewater treatment building. The waste water treatment building is currently used by the facility and the building may remain in continuous use. Regardless of future plans for building use, no remediation is required and thus, waste will not be generated as part of the CSA closure. There is presently no equipment in the CSA and therefore, dismantling or decontaminating will not occur.

As warranted, the CSA closure will be performed in accordance with the closure performance standard specified in 40 CFR 265.111 which states:

> "The owner or operator must close the facility in a manner that:
> (a) Minimizes the need for further maintenance, and
> (b) Controls, minimizes or eliminates to the extent necessary, to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere, and
> (c) Complies with the closure, of this subpart, including, but not limited to the requirements of 265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381, 265.404 and 264.1102."

II. Removal and Disposal/Decontamination of Waste, Equipment, Structure and Soil

There will be no removal and disposal/decontamination of waste, equipment, structure and soil as part of the CSA closure.

Wash water collected during the steam cleaning of the CSA floor prior to the concrete chip sampling in the CSA is containerized in one 55-gallon drum at the site. Waste characterization samples were collected from the wash water and the waste is currently pending transport to a permitted off-site disposal facility.

III. Removal and Decontamination of Tank Systems

There will be no removal or decontamination of tank systems conducted as part of the CSA closure because none are present.

IV. Quality Assurance and Quality Control Procedures (QA/QC)

QA/QC procedures are not applicable for the proposed clean closer. There will be no removal and disposal/decontamination of waste, equipment, structure and soil as part of the CSA closure.

V. Closure Schedule

The wash water will be disposed from the site before June 2010. Public notice will be initiated by CTDEP with assistance from Shaw two weeks following the approval of the closure plan by CT DEP. The public

comment period will end 45 days from the submittal of the public notice and, assuming no significant public comments are received, CT DEP will grant final approval of CPP 2 &3.

VI. Financial Assurance/Closure Estimates

NRG has provided annual updates to the financial assurance documentation on file with CT DEP for closure of the CSA. A copy of the most recent correspondence from NRG to CT DEP regarding the financial assurance is included in **Attachment 6**.

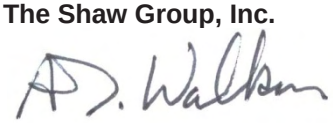
VII. Certifications of Closure

A closure certification documents will be prepared after closure is complete and will follow the requirements presented in the CTDEP Draft RCRA Plan Closure Guidance Document. The closure certification document will include the following (as appropriate):

A. provision for certification by owner operator within 60 days following closure (i.e., completion of all Public Involvement activities), and
B. provision for certification by Independent registered Professional Engineer that facility was closed in accordance with the approved closure plan,
C. provision for closure documentation report to document closure activities,
D. summary of all QA/QC data collected during closure,
E. photographic record of each milestone event, (identify each event in the plan),
F. list and justify all departures from approved closure plan,
G. certification statement,
H. verification sample results after decontamination or removal of equipment, structures and soil,
I. if clean closure was achieved but there are other operating units at the facility, submit a revised Part A permit application by deleting the closed regulated unit,
J. For a complete closure, i.e. all regulated units closed, the Part A must be withdrawn; for the withdrawal request must be submitted with the closure certification document.

If you have any questions regarding this addendum letter or any other site matter, please do not hesitate to call us.

Sincerely,
The Shaw Group, Inc.



Andrew D. Walker, LEP, LSP
Project Manager

cc: with attachments:

Tim Sisk, Montville Power LLC
Ed Keith, NRG (electronic)
Juan Perez, USEPA (electronic)
David Ringquist, CTDEP

Attachments:

Figure 1 Site Plan
Figure 2 CSA Plan

1: Laboratory Analytical Report – Concrete Chip and Wash Water
2: CSA Photos
3: Tables: Table 1 - Concrete Analytical Data – Positive Detections Only, Table 2 – Soil Analytical Data, Table 3 – Summary Statistics of Constituents Detected in Soil – AOC 12
4: CSA Boring
5: Laboratory Analytical Report – Soil
6: Correspondence between NRG and CT DEP Regarding Financial Assurance

FIGURES

Site Plan – Figure 1
CSA Plan – Figure 2

DRAWING NUMBER 100964400-SITEPLAN

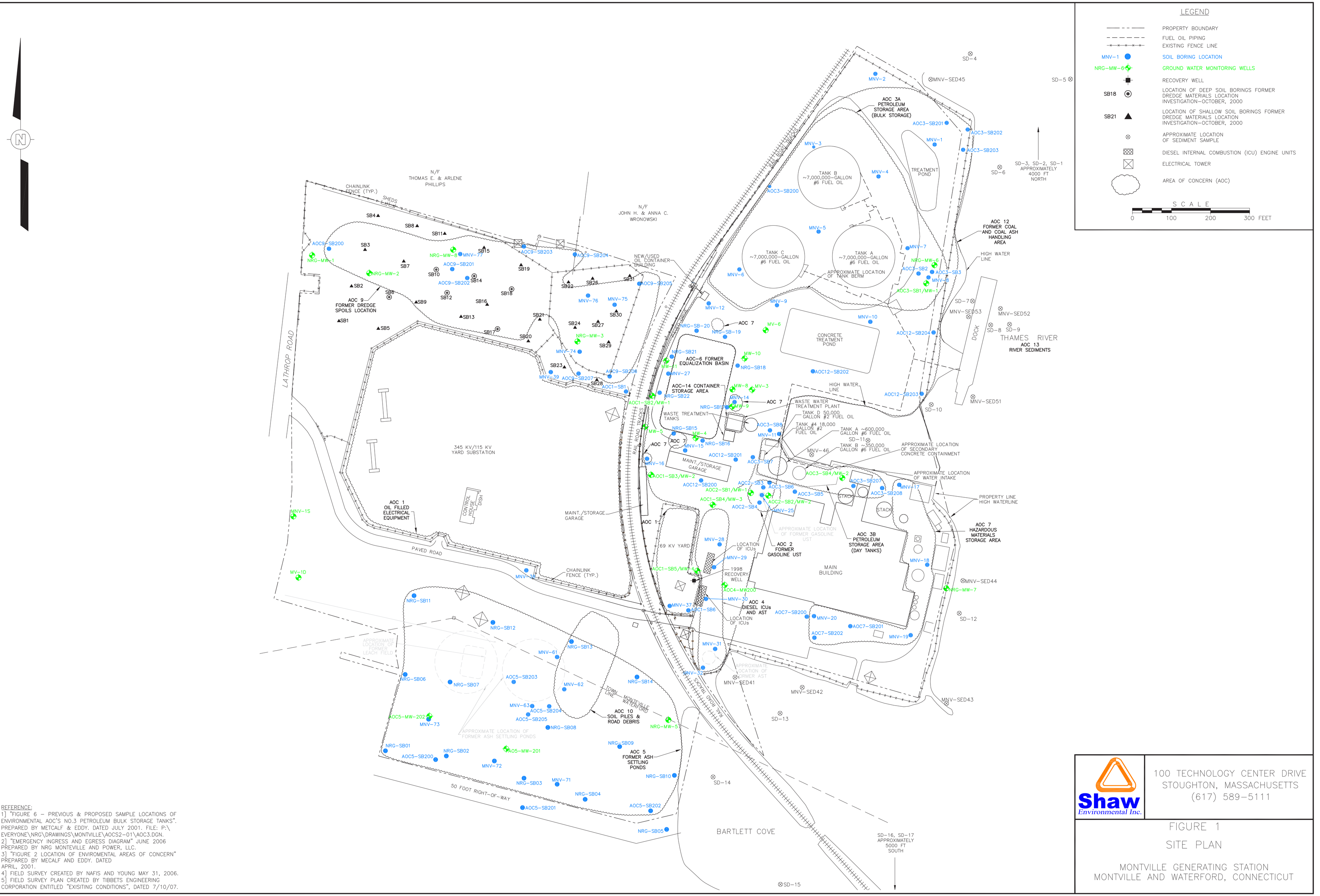
APPROVED BY -- | -- | --

CHECKED BY RC | 12/15/08

DRAWN BY CD | 12/15/08

OFFICE STOUGHTON

File: N:\MISC\N.R.G\MONTVILLE\100964400-SITEPLAN.dwg Layout: SITE PLAN User: chris.desiata May 24, 2010 - 1:16pm



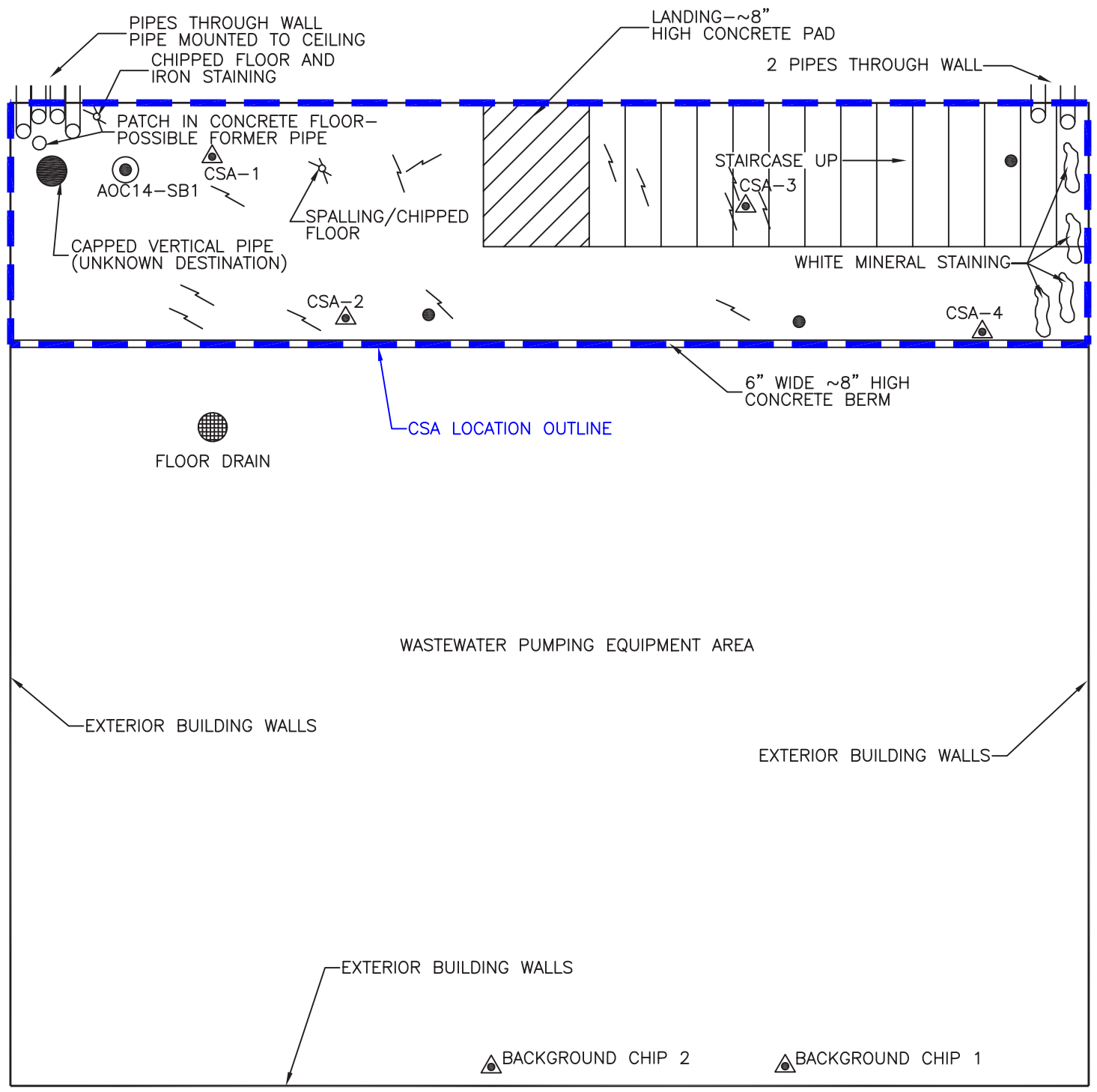
REFERENCE:
1] "FIGURE 6 – PREVIOUS & PROPOSED SAMPLE LOCATIONS OF ENVIRONMENTAL AOC'S NO.3 PETROLEUM BULK STORAGE TANKS". PREPARED BY METCALF & EDDY. DATED JULY 2001. FILE: P:\EVERYONE\NRG\DRAWINGS\MONTVILLE\AOCS2-01\AOC3.DGN.
2] "EMERGENCY INGRESS AND EGRESS DIAGRAM" JUNE 2006 PREPARED BY NRG MONTEVILLE AND POWER, LLC.
3] "FIGURE 2 LOCATION OF ENVIROMENTAL AREAS OF CONCERN" PREPARED BY MECALF AND EDDY. DATED APRIL, 2001.
4] FIELD SURVEY CREATED BY NAFIS AND YOUNG MAY 31, 2006.
5] FIELD SURVEY PLAN CREATED BY TIBBETS ENGINEERING CORPORATION ENTITLED "EXISITING CONDITIONS", DATED 7/10/07.

Shaw Environmental Inc.

100 TECHNOLOGY CENTER DRIVE
STOUGHTON, MASSACHUSETTS
(617) 589-5111

FIGURE 1
SITE PLAN

MONTVILLE GENERATING STATION
MONTVILLE AND WATERFORD, CONNECTICUT



LEGEND

- CONCRETE CHIP SAMPLE LOCATION (COMPLETED BY SHAW)
- CONCRETE CORE AND SUB SLAB SAMPLE LOCATION (PROPOSED)
- CONCRETE CORE AND SUB SLAB SAMPLE LOCATION (COMPLETED BY SHAW)
- SURFICIAL HAIRLINE CRACKS <1/16"

NOTES:

FEATURES SHOWN AT STAIRCASE AREA ARE LOCATED ON CSA FLOOR.

SCALE
0 5 10 FEET

REFERENCE:

PLAN DERIVED FROM SHAW ENVIRONMENTAL FIELD RECONNAISSANCE.

OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
STOUGHTON, MA	CD 05/24/10	JD 05/24/10	-- --	100964004–CSA INV MAP

Shaw Environmental Inc.
100 TECHNOLOGY CENTER DRIVE
STOUGHTON, MASSACHUSETTS
(617) 589–5111

FIGURE 2
CSA PLAN (AOC 14)
BASEMENT LEVEL OF
WASTEWATER TREATMENT BUILDING
MONTVILLE GENERATING STATION
MONTVILLE AND WATERFORD, CONNECTICUT

Attachment 1

Laboratory Analytical Report – Concrete Chip and Wash Water

Attachment 2

CSA Photos

Shaw Environmental and Infrastructure, Inc.
Photographic Record

Client: NRG Montville **Project Number:** 1009644004

Site Name: NRG Montville **Site Location: CSA**

Photographer:
Jessica Danieli

Date:
2/9/10

Direction: SE

Comments: Chipped Concrete floor- Southeast area of CSA

Photographer:
Jessica Danieli

Date:
2/9/10

Direction: East side of CSA

Comments: Patch in concrete floor- possible former pipe.

Shaw Environmental and Infrastructure, Inc.
Photographic Record

Client: NRG Montville **Project Number:** 1009644004

Site Name: NRG Montville **Site Location: CSA**

Photographer:
Jessica Danieli

Date:
2/9/10

Direction: Southeast area of CSA

Comments: Chipped floor, iron staining and capped cut pipe.

Photographer:
Jessica Danieli

Date:
2/9/10

Direction:

Comments:
Hairline cracks throughout CSA

Shaw Environmental and Infrastructure, Inc.
Photographic Record

Client: NRG Montville **Project Number:** 1009644004

Site Name: NRG Montville **Site Location: CSA**

Photographer:
Jessica Danieli

Date:
3/23/10

Direction:

Comments: AOC14-SB1-Core hole

Photographer:
Jessica Danieli

Date:
3/23/10

Direction:

Comments:
Concrete core 0- 14" at AOC14-SB1

Shaw Environmental and Infrastructure, Inc.
Photographic Record

Client: NRG Montville **Project Number:** 1009644004

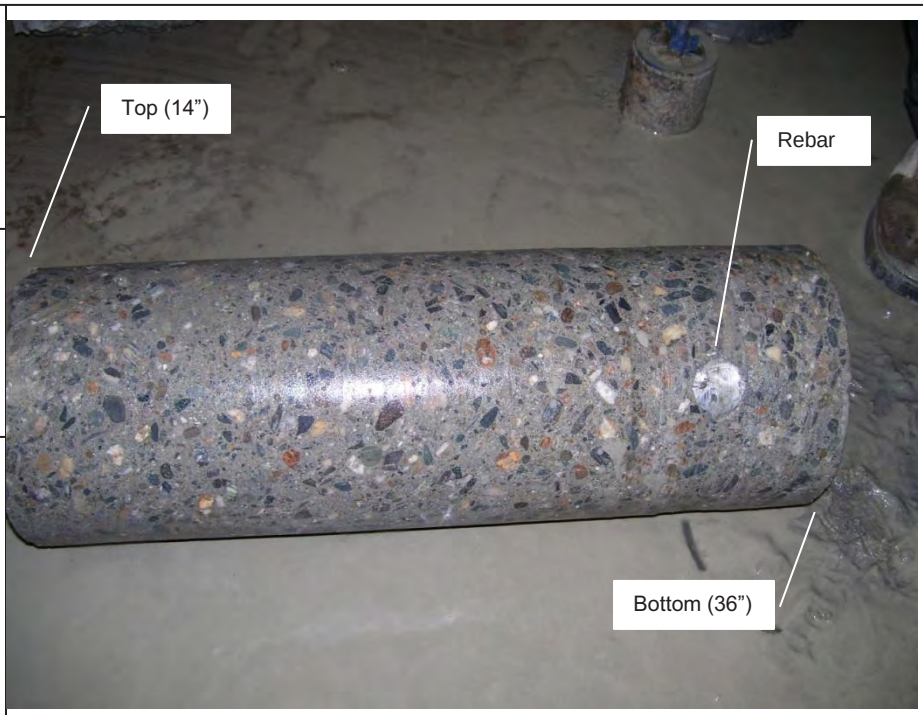
Site Name: NRG Montville **Site Location: CSA**

Photographer:
Jessica Danieli

Date:
3/23/10

Direction:

Comments:
Concrete core 14”- 36”at AOC14-SB1. Metal rebar at 32”.

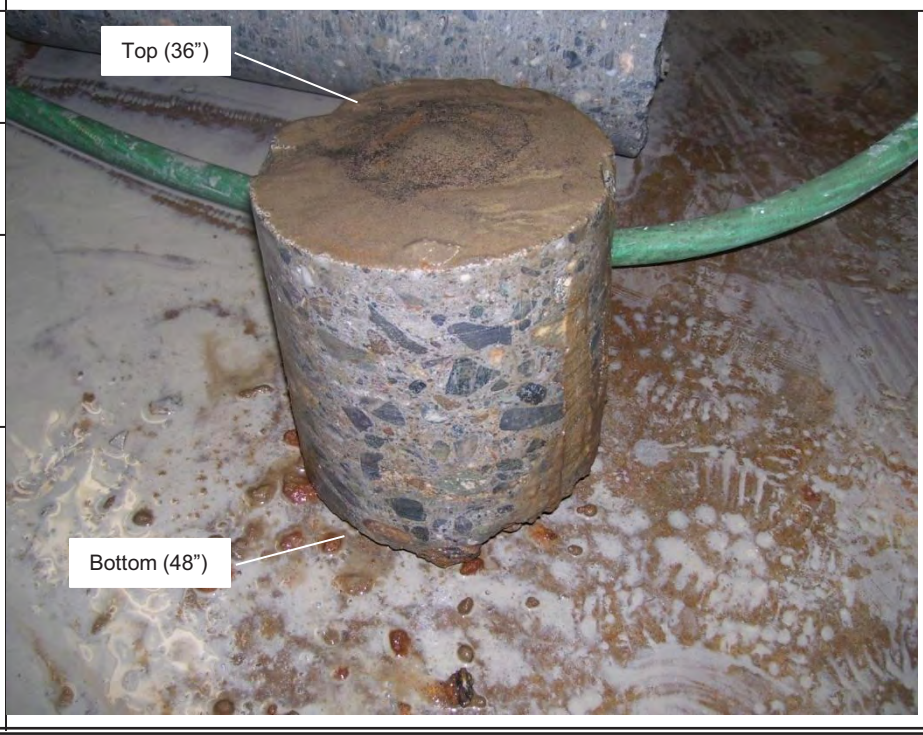


Photographer:
Jessica Danieli

Date:
3/23/10

Direction:

Comments:
Concrete core 36” – 48” at AOC14-SB1



Attachment 3

Table 1 - Concrete Analytical Data – Positive Detections Only
Table 2 – Soil Analytical Data
Table 3 – Summary of Statistics of Constituents Detected in Soil – AOC12

Table 1
Concrete Chip Analytical Results - Detects Only
AOC 14 - Container Storage Area
February 9, 2010

Montville Power LLC
Montville, CT

CONSTITUENT	Media Closure Criteria			BCKGRD-CHIP-1 2/9/2010 Primary	BCKGRD-CHIP-2 2/9/2010 Primary	CSA-CHIP-01 2/9/2010 Primary	CSA-CHIP-02 2/9/2010 Primary	CSA-CHIP-02 2/9/2010 Duplicate	CSA-CHIP-03 2/9/2010 Primary	CSA-CHIP-04 2/9/2010 Primary	Exceeds Minimum Background (Y/N)	Exceeds Maximum Background (Y/N)	Exceeds Media Closure Criteria (Y/N)
	GB PMC	I/C DEC	ResDEC										
Method 8260 (ug/kg)													
2-Butanone	80000	1000000	500000	<1.7UJ	25.3	<1.9UJ	<2.8	<1.5	<1.5	<1.6	N	N	N
Benzene	200	200000	21000	<0.51UJ	<0.53	<0.59UJ	<0.84	0.59	<0.46	0.51	Y	Y	N
Carbondisulfide	140000	1000000	500000	1.1JJ	<0.45	<0.50UJ	<0.72	<0.38	1.1JJ	2.1JJ	Y	Y	N
Toluene	67000	1000000	500000	<0.27UJ	<0.29	<0.32UJ	<0.45	0.44JJ	<0.25	0.47JJ	Y	Y	N
Method 8270 (Total) (ug/kg)													
Di-n-butylphthalate	140000	2500000	1000000	<225JBU	<22	<92.5JBU	<23	<23	<23	780B	Y	Y	N
Isophorone	7400	2500000	640000	<25	<24	<26	<25	<25	206JJ	504	Y	Y	N
Phenol	800000	2500000	1000000	<42UJ	<40UJ	66.7JJ	<42UJ	<42UJ	<41	<42UJ	Y	Y	N
Method 8270 (SPLP)(mg/l)													
Butyl benzyl phthalate	10	NE	NE	<0.00041	<0.00041	<0.00041	<0.00041	<0.00041	0.0011JJ	<0.00041	Y	Y	N
Phenol	40	NE	NE	<0.0021	0.0045JJ	<0.0021	<0.0021	<0.0021UJ	<0.0021	<0.0021	N	N	N
Metals (Total) (mg/kg)													
Antimony	NE	8200	27	<0.16U	<0.16U	<0.17U	<0.15U	0.20BJ	<0.16U	0.19BJ	Y	Y	N
Arsenic	NE	10	10	2.4	1.6BJ	1.7BJ	2.3	2.8	1.1BJ	1.9BJ	Y	Y	N
Beryllium	NE	2	2	0.47	0.34BJ	0.37BJ	0.35BJ	0.49	0.19BJ	0.36BJ	Y	Y	N
Cadmium	NE	1000	34	<0.025	0.030BJ	<0.026	<0.024	<0.026U	<0.025U	<0.026U	N	N	N
Chromium	NE	100	100	19.8	14.8	10.6	16	15.8	4.9	12.5	Y	N	N
Copper	NE	76000	2500	16.5	14.7	8.9	11.8	14.4	8	11.4	N	N	N
Lead	NE	1000	400	3.1	3.6	2.2	2.2	4.1	3.4	3.4	Y	Y	N
Mercury	NE	610	20	0.015BJ	0.017BJ	<0.015	0.042	<0.014U	0.021BJ	<0.013U	Y	Y	N
Nickel	NE	7500	1400	11.9	12.5	8	7.7	10.5	4.5	9.4	N	N	N
Vanadium	NE	14000	470	30.2	24.3	17.5	17.6	23.4	11.7	19.7	N	N	N
Zinc	NE	610000	20000	21.8	22.2	17.6	15.5	23.8	23.8	22.8	Y	Y	N
Metals (SPLP) (mg/l)													
Chromium	0.5	NE	NE	0.031	0.028	0.025	0.023J	0.02	0.023	0.018	N	N	N
Copper	13	NE	NE	0.0022BJ	0.0021BJ	0.0034BJ	0.0021BJ	0.0026BJ	0.0028BJ	0.0023BJ	Y	Y	N
Nickel	1	NE	NE	<0.00030	0.00080BJ	0.00030BJ	<0.00030	<0.00030	<0.00030	<0.00030	N	N	N
Vanadium	0.5	NE	NE	<0.0011U	0.0049BJ	0.0026BJ	<0.0011U	<0.0011U	<0.0011U	<0.0011U	Y	N	N
CT ETPH (mg/kg)													
ETPH	2500	2500	500	76.6	26.4	<13	14.0JJ	40.2	12.1JJ	36.9	Y	N	N

Notes:

GB PMC = CT DEP GB groundwater area pollutant mobility criteria
I/C DEC = CT DEP Industrial/Commercial Direct Exposure Criteria
ResDEC = CT CEP Residential Direct Exposure Criteria
U = Constituent determined to be below detection limit by validator.
B = Constituent detected in associated method blank (organics).
or result between IDL and MDL (inorganics).
J = Estimated value determined by lab and/or validator.
Lab and validator qualifiers are shown.

Table 2
Soil Analytical Results
AOC 14 - CSA
March 23, 2010

Montville Power LLC
Montville, CT

CONSTITUENT	Media Closure Criteria GB PMC	I/C DEC	ResDEC	AOC14-SB1 3/23/2010 0.25 Primary	AOC14-SB1 3/23/2010 0.25 Duplicate
VOCs (ug/kg)					
1,1,1,2-Tetrachloroethane	200	220000	24000	<0.21	<0.24
1,1,1-Trichloroethane	40000	1000000	500000	<0.24	<0.28
1,1,2,2-Tetrachloroethane	100	29000	3100	<0.16UJ	<0.18UJ
1,1,2-Trichloroethane	1000	100000	11000	<0.14	<0.16
1,1-Dichloroethane	14000	1000000	500000	<0.22	<0.25
1,1-Dichloroethene	1400	9500	1000	<0.58	<0.67
1,1-Dichloropropene	NE	NE	NE	<0.27	<0.31
1,2,3-Trichlorobenzene	NE	NE	NE	<0.71UJ	<0.82UJ
1,2,3-Trichloropropane	NE	NE	NE	<1.4UJ	<1.6UJ
1,2,4-Trichlorobenzene	14000	2500000	680000	<0.54UJ	<0.63UJ
1,2,4-Trimethylbenzene	70000	1000000	500000	<0.15UJ	<0.17UJ
1,2-Dibromo-3-chloropropane	NE	4100	440	<2.4UJ	<2.8UJ
1,2-Dibromoethane (EDB)	100	67	7	<0.14	<0.17
1,2-Dichlorobenzene	3100	1000000	500000	<0.28UJ	<0.32UJ
1,2-Dichloroethane	200	63000	6700	<0.19	<0.22
1,2-Dichloropropane	1000	84000	9000	<0.19	<0.22
1,3,5-Trimethylbenzene	70000	1000000	500000	<0.094UJ	<0.11UJ
1,3-Dichlorobenzene	120000	1000000	500000	<0.21UJ	<0.24UJ
1,3-Dichloropropane	NE	NE	NE	<0.29	<0.33
1,4-Dichlorobenzene	15000	240000	26000	<0.40UJ	<0.46UJ
2,2-Dichloropropane	NE	NE	NE	<0.31	<0.36
2-Butanone	80000	1000000	500000	<1.2	<1.4
2-Hexanone	NE	NE	NE	<0.33	<0.38
4-Isopropyltoluene	41800	1000000	500000	<0.090UJ	<0.10UJ
4-Methyl-2-pentanone	14000	1000000	500000	<0.75	<0.86
Acetone	140000	1000000	500000	<0.97	<1.1
Acrylonitrile	100	11000	1100	<1.7	<1.9
Benzene	200	200000	21000	<0.36	<0.42
Bromobenzene	NE	NE	NE	<0.39UJ	<0.46UJ
Bromodichloromethane	110	92000	9900	<0.15	<0.17
Bromoform	800	720000	78000	<0.65	<0.75
Bromomethane	2000	1000000	95000	<0.25	<0.29
Carbon tetrachloride	1000	44000	4700	<0.27	<0.31
Carbondisulfide	140000	1000000	500000	1.4JJ	2.8JJ
Chlorobenzene	20000	1000000	500000	<0.51	<0.59
Chloroethane	NE	NE	NE	<0.60	<0.70
Chloroform	1200	940000	100000	<0.23	<0.26
Chloromethane	540	440000	47000	<0.66	<0.76
cis-1,2-Dichloroethene	14000	1000000	500000	<0.44	<0.50
cis-1,3-Dichloropropene	NE	NE	NE	<0.13	<0.16
Dibromochloromethane	100	68000	7300	<0.095	<0.11
Dibromomethane	NE	NE	NE	<0.75	<0.86
Dichlorodifluoromethane	NE	NE	NE	<0.20	<0.23
Dichloromethane	1000	760000	82000	<0.33	<0.38
Ethylbenzene	10100	1000000	500000	<0.12	<0.14
Freon 113	NE	NE	NE	<0.69	<0.80
Hexachlorobutadiene	1000	73000	7900	<0.52UJ	<0.61UJ
Isopropylbenzene	132000	1000000	500000	<0.11UJ	<0.13UJ
Methyltert-butylether	20000	1000000	500000	<0.18	<0.21
Naphthalene	56000	2500000	1000000	<3.7UJ	<4.3UJ
n-Butylbenzene	14000	1000000	500000	<0.15UJ	<0.17UJ

Table 2
Soil Analytical Results
AOC 14 - CSA
March 23, 2010

Montville Power LLC
Montville, CT

CONSTITUENT	Media Closure Criteria GB PMC	I/C DEC	ResDEC	AOC14-SB1 3/23/2010 0.25 Primary	AOC14-SB1 3/23/2010 0.25 Duplicate
n-Propylbenzene	14000	1000000	500000	<0.14UJ	<0.16UJ
o-Chlorotoluene	NE	NE	NE	<0.22UJ	<0.26UJ
p-Chlorotoluene	NE	NE	NE	<0.36UJ	<0.42UJ
sec-Butylbenzene	14000	1000000	500000	<0.14UJ	<0.17UJ
Styrene	20000	1000000	500000	<0.59	<0.68
tert-Butylbenzene	14000	1000000	500000	<0.14UJ	<0.16UJ
Tetrachloroethene	1000	110000	12000	<0.12	<0.14
Tetrahydrofuran	NE	NE	NE	<2.0	<2.3
Toluene	67000	1000000	500000	<0.20	<0.23
trans-1,2-Dichloroethene	20000	1000000	500000	<0.53	<0.61
trans-1,3-Dichloropropene	NE	NE	NE	<0.11	<0.13
trans-1,4-Dichloro-2-butene	NE	NE	NE	<1.3	<1.5
Trichloroethene	1000	520000	56000	<0.25	<0.29
Trichlorofluoromethane	260000	1000000	500000	<0.40	<0.46
Vinyl chloride	400	3000	320	<0.45	<0.52
m/p-xylene	NE	NE	NE	<0.20	<0.23
o-Xylene	NE	NE	NE	<0.13	<0.16
Xylene (total)	19500	1000000	500000	<0.20	<0.23
Total SVOCs (ug/kg)					
1,2,4,5-Tetrachlorobenzene	400	NE	20000	<9.1	<9.0
1,2,4-Trichlorobenzene	14000	2500000	680000	<26	<26
2,4,5-Trichlorophenol	140000	2500000	1000000	<45	<45
2,4,6-Trichlorophenol	1000	520000	56000	<42	<41
2,4-Dichlorophenol	4200	NE	203000	<36	<35
2,4-Dimethylphenol	28000	2500000	1000000	<61	<60
2,4-Dinitrophenol	2800	2500000	140000	<300	<300
2,4-Dinitrotoluene	2800	2500000	140000	<150	<150
2,6-Dinitrotoluene	1400	2000000	68000	<29	<29
2-Chloronapthalene	110000	2500000	1000000	<25	<25
2-Chlorophenol	7000	2500000	339000	<16	<16
2-Methylnaphthalene	9800	2500000	474000	<25	29.4JJ
2-Methylphenol	70000	2500000	1000000	<17	<17
3,3-Dichlorobenzidine	330	13000	1400	<7.3	<7.2
4,6-Dinitro-o-cresol	NE	NE	NE	<300	<300
4-Bromophenylphenyl ether	82000	1000000	500000	<25	<24
4-Chloro-3-methylphenol	NE	NE	NE	<21	<21
4-Chloroaniline	5600	2500000	270000	<150	<150
4-Chlorophenylphenyl ether	82000	1000000	500000	<27	<27
4-Methylphenol	7000	2500000	340000	<32	<32
Acenaphthene	84000	2500000	1000000	<26	30.6JJ
Acenaphthylene	84000	2500000	1000000	<23	<22
Aniline	1200	NE	107000	<610	<600
Anthracene	400000	2500000	1000000	<24	115JJ
Benzo(a)anthracene	1000	7800	1000	43.9JJ	297JJ
Benzo(a)pyrene	1000	1000	1000	<18	178JJ
Benzo(b)fluoranthene	1000	7800	1000	<35	188JJ
Benzo(ghi)perylene	42000	2500000	1000000	<20	126JJ
Benzo(k)fluoranthene	1000	78000	8400	<9.0	192JJ
bis(2-Chloroethoxy)methane	NE	NE	NE	<24	<23
Bis(2-chloroethyl)ether	2400	5200	1000	<6.5	<6.4
Bis(2-chloroisopropyl)ether	2400	82000	8800	<29	<28
Bis(2-ethylhexyl)phthalate	11000	410000	44000	<21	245JJ

Table 2
Soil Analytical Results
AOC 14 - CSA
March 23, 2010

Montville Power LLC
Montville, CT

	Media Closure Criteria			AOC14-SB1 3/23/2010 0.25	AOC14-SB1 3/23/2010 0.25
CONSTITUENT	**GB PMC**	**I/C DEC**	**ResDEC**	**Primary**	**Duplicate**
Butyl benzyl phthalate	200000	2500000	1000000	<13	<13
Carbazole	1000	290000	31000	<24	219JJ
Chrysene	1000	780000	84000	50.3JJ	299JJ
Dibenzo(a,h)anthracene	1000	1000	1000	<20	<19
Dibenzofuran	5600	2500000	270000	<26	36.8JJ
Diethyl phthalate	1100000	1000000	1000000	<26	<26
Dimethyl phthalate	1100000	1000000	1000000	<21	<21
Di-n-butylphthalate	140000	2500000	1000000	151JJ	147JJ
Di-n-octyl phthalate	20000	2500000	1000000	<16	<16
Fluoranthene	56000	2500000	1000000	75.9JJ	865
Fluorene	56000	2500000	1000000	<6.7	25.5JJ
Hexachlorobenzene	1000	3600	1000	<26	<26
Hexachlorobutadiene	1000	73000	7900	<24	<23
Hexachlorocyclopentadiene	9800	2500000	470000	<4.1UJ	<4.0UJ
Hexachloroethane	1000	410000	44000	<25	<24
Indeno(1,2,3-cd)pyrene	1000	7800	1000	<19	100JJ
Isophorone	7400	2500000	640000	<30	<30
m-Nitroaniline	4200	2500000	200000	<150	<150
Naphthalene	56000	2500000	1000000	<7.0	132JJ
Nitrobenzene	1000	1000000	34000	<9.0	<8.9
N-Nitrosodiphenylamine	1400	1200000	130000	<16	<16
N-Nitrosodipropylamine	1000	1000	1000	<19	<19
o-Nitroaniline	1650	1200000	4100	<150	<150
o-Nitrophenol	11000	2500000	540000	<36	<36
Pentachloronitrobenzene	100	NE	2400	<27	<27
Pentachlorophenol	1000	48000	5100	<56	<56
Phenanthrene	40000	2500000	1000000	66.2JJ	528
Phenol	800000	2500000	1000000	<50	<50
p-Nitroaniline	4200	2500000	200000	<22	<22
p-Nitrophenol	NE	NE	NE	<300	<300
Pyrene	40000	2500000	1000000	57.7JJ	624
Pyridine	140	NE	7000	<610	<600
SPLP SVOCs (mg/l)					
1,2,4,5-Tetrachlorobenzene	0.02	NE	NE	<0.00027	<0.00027
1,2,4-Trichlorobenzene	0.7	NE	NE	<0.00039	<0.00039
2,4,5-Trichlorophenol	7	NE	NE	<0.00040	<0.00040
2,4,6-Trichlorophenol	0.1	NE	NE	<0.00038	<0.00038
2,4-Dichlorophenol	0.21	NE	NE	<0.00069	<0.00069
2,4-Dimethylphenol	1.4	NE	NE	<0.0022	<0.0022
2,4-Dinitrophenol	0.5	NE	NE	<0.0025	<0.0025
2,4-Dinitrotoluene	0.14	NE	NE	<0.0013	<0.0013
2,6-Dinitrotoluene	0.1	NE	NE	<0.00034	<0.00034
2-Chloronapthalene	5.6	NE	NE	<0.00031	<0.00031
2-Chlorophenol	0.35	NE	NE	<0.00068	<0.00068
2-Methylnaphthalene	0.49	NE	NE	<0.00031	<0.00031
2-Methylphenol	3.5	NE	NE	<0.00048	<0.00048
3,3-Dichlorobenzidine	0.1	NE	NE	<0.0025	<0.0025
4,6-Dinitro-o-cresol	---	NE	NE	<0.0050	<0.0050
4-Bromophenylphenyl ether	4.1	NE	NE	<0.00032	<0.00032
4-Chloro-3-methylphenol	---	NE	NE	<0.00057	<0.00057
4-Chloroaniline	0.28	NE	NE	<0.00058	<0.00058
4-Chlorophenylphenyl ether	4.1	NE	NE	<0.00061	<0.00061

Table 2
Soil Analytical Results
AOC 14 - CSA
March 23, 2010

Montville Power LLC
Montville, CT

CONSTITUENT	Media Closure Criteria GB PMC	I/C DEC	ResDEC	AOC14-SB1 3/23/2010 0.25 Primary	AOC14-SB1 3/23/2010 0.25 Duplicate
4-Methylphenol	0.35	NE	NE	<0.00063	<0.00063
Acenaphthene	4.2	NE	NE	<0.00034	<0.00034
Acenaphthylene	4.2	NE	NE	<0.0013	<0.0013
Aniline	0.06	NE	NE	<0.00046	<0.00046
Anthracene	20	NE	NE	<0.00027	<0.00027
Benzo(a)anthracene	0.0006	NE	NE	<0.00027	<0.00027
Benzo(a)pyrene	0.002	NE	NE	<0.00023	<0.00023
Benzo(b)fluoranthene	0.0008	NE	NE	<0.00027	<0.00027
Benzo(ghi)perylene	2.1	NE	NE	<0.00061	<0.00061
Benzo(k)fluoranthene	0.005	NE	NE	<0.00029	<0.00029
bis(2-Chloroethoxy)methane	---	NE	NE	<0.00035	<0.00035
Bis(2-chloroethyl)ether	0.12	NE	NE	<0.00023	<0.00023
Bis(2-chloroisopropyl)ether	0.12	NE	NE	<0.00021	<0.00021
Bis(2-ethylhexyl)phthalate	0.02	NE	NE	0.0041	0.0042
Butyl benzyl phthalate	10	NE	NE	<0.0045JBU	<0.00041
Carbazole	---	NE	NE	<0.00029	<0.00029
Chrysene	0.048	NE	NE	<0.00022	<0.00022
Dibenzo(a,h)anthracene	0.002	NE	NE	<0.00025	<0.00025
Dibenzofuran	0.28	NE	NE	<0.00032	<0.00032
Diethyl phthalate	56	NE	NE	<0.00061	<0.00061
Dimethyl phthalate	56	NE	NE	<0.0013	<0.0013
Di-n-butylphthalate	7	NE	NE	<0.0029JBU	0.0029JBU
Di-n-octyl phthalate	1	NE	NE	<0.00034	<0.00034
Fluoranthene	2.8	NE	NE	<0.00022	<0.00022
Fluorene	2.8	NE	NE	<0.00029	<0.00029
Hexachlorobenzene	0.01	NE	NE	<0.00016	<0.00016
Hexachlorobutadiene	0.0045	NE	NE	<0.00061	<0.00061
Hexachlorocyclopentadiene	0.49	NE	NE	<0.0025UJ	<0.0025UJ
Hexachloroethane	0.03	NE	NE	<0.00043	<0.00043
Indeno(1,2,3-cd)pyrene	0.005	NE	NE	<0.00029	<0.00029
Isophorone	0.37	NE	NE	<0.00047	<0.00047
m-Nitroaniline	0.5	NE	NE	<0.00032	<0.00032
Naphthalene	2.8	NE	NE	<0.00033	<0.00033
Nitrobenzene	0.1	NE	NE	<0.00031	<0.00031
N-Nitrosodiphenylamine	0.1	NE	NE	<0.00061	<0.00061
N-Nitrosodipropylamine	0.1	NE	NE	<0.00041	<0.00041
o-Nitroaniline	0.5	NE	NE	<0.00033	<0.00033
o-Nitrophenol	0.56	NE	NE	<0.00066	<0.00066
Pentachloronitrobenzene	0.0013	NE	NE	<0.00028	<0.00028
Pentachlorophenol	0.01	NE	NE	<0.0033	<0.0033
Phenanthrene	2	NE	NE	<0.00026	<0.00026
Phenol	40	NE	NE	<0.0021	<0.0021
p-Nitroaniline	0.21	NE	NE	<0.00033	<0.00033
p-Nitrophenol	---	NE	NE	<0.0050	<0.0050
Pyrene	2	NE	NE	<0.00025	<0.00025
Pyridine	0.007	NE	NE	<0.00050	<0.00050
PCBs (ug/kg)					
Aroclor 1016	NE	NE	NE	<30	<30
Aroclor 1221	NE	NE	NE	<7.8	<7.8
Aroclor 1232	NE	NE	NE	<17	<17
Aroclor 1242	NE	NE	NE	<10	<10
Aroclor 1248	NE	NE	NE	<32	<32

Table 2
Soil Analytical Results
AOC 14 - CSA
March 23, 2010

Montville Power LLC
Montville, CT

CONSTITUENT	Media Closure Criteria GB PMC	I/C DEC	ResDEC	AOC14-SB1 3/23/2010 0.25 Primary	AOC14-SB1 3/23/2010 0.25 Duplicate
Aroclor 1254	NE	NE	NE	<14	<14
Aroclor 1260	NE	NE	NE	<23	<23
PCBs	NE	10000	1000	<32	<32
Total Metals (mg/kg)					
Antimony	---	8200	27	<0.12	<0.12
Arsenic	---	10	10	**{12.9}**	**{16.0}**
Beryllium	---	2	2	0.18BJ	0.30BJ
Cadmium	---	1000	34	<0.017	<0.017
Chromium	---	100	100	4.9	6.2
Copper	---	76000	2500	13.2	19.6
Lead	---	1000	400	2.3	2.9
Mercury	---	610	20	<0.015U	<0.015U
Nickel	---	7500	1400	6.7	6.2
Selenium	---	10000	340	0.38BJ	0.27BJ
Silver	---	10000	340	0.48BJ	0.97
Thallium	---	160	5.4	<0.13	<0.13
Vanadium	---	14000	470	7.8	9.7
Zinc	---	610000	20000	7.7	10.5
SPLP Metals (mg/l)					
Antimony	0.06	NE	NE	<0.0012U	<0.0012
Arsenic	0.1	NE	NE	<0.0019	<0.0019
Beryllium	0.04	NE	NE	<0.00020	<0.00020
Cadmium	0.05	NE	NE	<0.00012	<0.00012
Chromium	0.5	NE	NE	<0.00050	<0.00050
Copper	13	NE	NE	0.0012BJ	<0.00080U
Lead	0.15	NE	NE	<0.0015	<0.0015
Mercury	0.02	NE	NE	<0.000048	<0.000048
Nickel	1	NE	NE	0.0014BJ	0.00050BJ
Selenium	0.5	NE	NE	<0.0017U	<0.0017U
Silver	0.36	NE	NE	<0.00050U	<0.00050U
Thallium	0.05	NE	NE	<0.00070	<0.00070
Vanadium	0.5	NE	NE	<0.0011	<0.0011
Zinc	50	NE	NE	<0.0020U	<0.0020U
CT ETPH (mg/kg)					
ETPH	2500	2500	500	<15	18.0JJ

Notes:
GB PMC = CT DEP GB groundwater area pollutant mobility criteria
I/C DEC = CT DEP Industrial/Commercial Direct Exposure Criteria
ResDEC = CT CEP Residential Direct Exposure Criteria
NE = No standard established.
B = Constituent detected in associated method blank (organics).
or result between IDL and MDL (inorganics).
J = Estimated value (lab qualifier).
Lab and validator qualifiers are shown.
{Bold} = Result is greater than I/C DEC or Res DEC .

Table 3
SUMMARY STATISTICS OF CONSTITUENTS DETECTED IN SOIL
AOC 12 - Former Coal and Coal Ash Handling Area

Montville Power LLC
Montville, Connecticut

Constituent	Units	** Freq. of Detect.	% of Detect.	Minimum Concentration			Maximum Concentration			*** Avg. Conc.
Volatile Organic Compounds										
1,1,1-Trichloroethane	mg/kg	1/29	3%	0.31	MNV-11	2.8 ft	0.31	MNV-11	2.8 ft	0.092
Bromoform	mg/kg	1/29	3%	0.036	MNV-04	1.5 ft	0.036	MNV-04	1.5 ft	0.082
Dichloromethane	mg/kg	12/29	41%	0.0032	NRG-SB17	3.0 ft	2.2	MNV-11	2.8 ft	0.205
Tetrachloroethene	mg/kg	7/29	24%	0.012	NRG-SB19	3.0 ft	0.23	MNV-16	4.5 ft	0.102
Toluene	mg/kg	3/29	10%	0.0011	NRG-SB16	3.0 ft	0.0014	NRG-SB17	3.0 ft	0.082
Semi-Volatile Organic Compounds										
2-Methylnaphthalene	mg/kg	2/18	11%	0.61	MNV-14	11.0 ft	23	MNV-08	10.0	1.460
Acenaphthene	mg/kg	1/38	3%	100.0	MNV-08	10.0 ft	100.0	MNV-08	10.0	2.877
Acenaphthylene	mg/kg	1/38	3%	4.1	MNV-08	10.0 ft	4.1	MNV-08	10.0	0.353
Anthracene	mg/kg	1/38	3%	46.0	MNV-08	10.0 ft	46.0	MNV-08	10.0	1.456
Benzo(a)anthracene	mg/kg	1/38	3%	30.0	MNV-08	10.0 ft	30.0	MNV-08	10.0	1.035
Benzo(a)pyrene	mg/kg	1/38	3%	19.0	MNV-08	10.0 ft	19.0	MNV-08	10.0	0.745
Benzo(b)fluoranthene	mg/kg	2/38	5%	0.43	MNV-11	2.8 ft	23.0	MNV-08	10.0	0.858
Benzo(ghi)perylene	mg/kg	1/38	3%	2.2	MNV-08	10.0 ft	2.2	MNV-08	10.0	0.303
Benzo(k)fluoranthene	mg/kg	1/38	3%	8.3	MNV-08	10.0 ft	8.3	MNV-08	10.0	0.464
Bis(2-ethylhexyl)phthalate	mg/kg	3/5	60%	0.31	MNV-27	3.5 ft	0.73	MNV-02	2.0 ft	0.346
Chrysene	mg/kg	3/38	8%	0.41	MNV-14	11.0 ft	29.0	MNV-08	10.0	1.023
Dibenzo(a,h)anthracene	mg/kg	1/38	3%	0.92	MNV-08	10.0 ft	0.92	MNV-08	10.0	0.269
Fluoranthene	mg/kg	4/38	11%	0.36	MNV-11	2.8 ft	140.0	MNV-08	10.0	3.956
Fluorene	mg/kg	1/38	3%	96.0	MNV-08	10.0 ft	96.0	MNV-08	10.0	2.771
Indeno(1,2,3-cd)pyrene	mg/kg	1/38	3%	2.7	MNV-08	10.0 ft	2.7	MNV-08	10.0	0.316
Naphthalene	mg/kg	1/39	3%	110.0	MNV-08	10.0 ft	110.0	MNV-08	10.0	3.060
Phenanthrene	mg/kg	3/38	8%	0.44	MNV-14	11.0 ft	280.0	MNV-08	10.0	7.631
Pyrene	mg/kg	1/38	3%	110.0	MNV-08	10.0 ft	110.0	MNV-08	10.0	3.140
Petroleum Hydrocarbons										
ETPH	mg/kg	11/11	100%	11.0	AOC3-SB7	0.8 ft	180.0	AOC3-SB3	7.3 ft	70.182
TPH	mg/kg	1/15	7%	71	MNV-11	2.8 ft	71	MNV-11	2.8 ft	22.833
Polychlorinated Biphenyls (PCBs)										
Aroclor 1248	mg/kg	1/11	9%	0.039	AOC1-SB2-MW-1	2.8 ft	0.039	AOC1-SB2-MW-1	2.8 ft	0.035
Aroclor 1260	mg/kg	1/11	9%	0.056	AOC1-SB2-MW-1	2.8 ft	0.056	AOC1-SB2-MW-1	2.8 ft	0.037
PCB's	mg/kg	1/11	9%	0.095	AOC1-SB2-MW-1	2.8 ft	0.095	AOC1-SB2-MW-1	2.8 ft	0.044
Metals										
Antimony	mg/kg	13/33	39%	0.37	NRG-SB18	0.5 ft	1.5	NRG-SB19	0.5 ft	1.014
Arsenic	mg/kg	41/43	95%	1.31	NRG-SB21	3.0 ft	206	AOC12-SB203	1.3 ft	22.557
Beryllium	mg/kg	28/37	76%	0.262	NRG-SB16	3.0 ft	2.0	MNV-01	9.0 ft	0.491
Cadmium	mg/kg	24/33	73%	0.209	NRG-SB15	1.5 ft	1.28	NRG-SB19	0.5 ft	0.509
Chromium	mg/kg	33/33	100%	3.2	NRG-SB16	3.0 ft	97.3	NRG-SB19	0.5 ft	16.267
Copper (SPLP)	mg/l	1/9	11%	0.11	MNV-10	7.0 ft	0.11	MNV-10	7.0 ft	0.034
Copper	mg/kg	33/33	100%	2.7	NRG-SB16	3.0 ft	65.2	NRG-SB19	0.5 ft	15.697
Lead (SPLP)	mg/l	2/9	22%	0.0050	MNV-16	4.5 ft	0.014	MNV-27	3.5 ft	0.004
Lead	mg/kg	30/35	86%	1.4	NRG-SB16	3.0 ft	89.0	NRG-SB19	0.5 ft	14.644
Mercury	mg/kg	10/33	30%	0.069	MNV-10	7.0 ft	0.57	MNV-01	9.0 ft	0.111
Nickel	mg/kg	26/33	79%	2.3	NRG-SB16	3.0 ft	129	NRG-SB17	0.5 ft	15.158
Selenium	mg/kg	8/33	24%	0.242	NRG-SB15	1.5 ft	4.34	NRG-SB15	3.0 ft	1.726
Silver	mg/kg	1/33	3%	1.1	NRG-SB19	0.5 ft	1.1	NRG-SB19	0.5 ft	0.423
Thallium	mg/kg	11/33	33%	0.42	NRG-SB22	1.5 ft	1.61	NRG-SB15	3.0 ft	0.942
Zinc (SPLP)	mg/l	9/9	100%	0.056	MNV-16	4.5 ft	1.1	MNV-10	7.0 ft	0.217
Zinc	mg/kg	33/33	100%	3.8	NRG-SB16	3.0 ft	68.9	NRG-SB16	0.5 ft	22.785

NOTES:

** Frequency of detection indicates the number of samples in which a constituent was detected over the number of samples tested for the constituent.

*** Average concentration calculated using 1/2 the detection limit for non-detect results.

Attachment 4

CSA Boring

Drilling Log

Soil Boring **AOC-14-SB1**

Project *NRG Montville* Owner *Montville Power, LLC*

Location *74 Lathrop Road, Montville, Connecticut* Proj. No. *1009644004*

Surface Elev. *NA* Total Hole Depth *4.5 ft.* North _____ East _____

Top of Casing *NA* Water Level Initial *NA* Static *NA* Diameter _____

Screen: Dia *NA* Length *NA* Type/Size *NA*

Casing: Dia *NA* Length *NA* Type *NA*

Fill Material *Native* Rig/Core *Hand Auger*

Drill Co. *Shaw* Method *Hand Auger*

Driller *J. Danieli* Log By *J. Danieli* Date *3/23/10* Permit # *NA*

Checked By _____ License No. _____

COMMENTS

ND = Not detected

Sample collected 0' - 0.5' below concrete slab was sent to the laboratory for analysis of VOC, SVOC, 13 PPM Metals, SPLP 13 PPM Metals, CT ETPH and PCB.

Depth (ft.)	PID (ppm)	Sample ID / % Recovery / Blow Count / Recovery	Graphic Log	USCS Class.	Description (Color, Texture, Structure) Geologic Descriptions are Based on the USCS.
0	ND				Concrete Slab (4' Thick).
					0" - 36": Concrete consists of solid, aggregate concrete with some metal rebar
2					
					36" - 48": Mud slab, concrete consists of solid, aggregate concrete
4	ND			SW	Brown, saturated, loose, coarse to fine SAND and fine GRAVEL, (no staining, no odor)
					End of exploration at 4.5 feet below ground surface grade.
6					
8					
10					

Attachment 5

Laboratory Analytical Report – Soil

Attachment 6

Correspondence between NRG and CT DEP Regarding Financial Assurance

NRG Energy, Inc.
211 Carnegie Center
Princeton, NJ 08540

Phone: 609.524.4500
Fax: 609.524.4501

August 4, 2009

Commissioner, Connecticut Department of Environmental Protection
c/o Mr. Mark Latham
Waste Engineering and Enforcement Division
Bureau of Waste Management
79 Elm Street
Hartford, CT 06106

Re: Norwalk Harbor Station Surface Impoundment and Container Storage Area
South Norwalk, CT (EPA ID No. CTD000845214)
Owner: Norwalk Harbor Power LLC

Devon Station Surface Impoundment and Container Storage Area
Milford, CT (EPA ID No. CTD000845248)
Owner: Devon Power LLC

Montville Station Surface Container Storage Area
Uncasville, CT (EPA ID No. CTD049181654)
Owner: Montville Power LLC

Middletown Station Container Storage Area
Middletown, CT (EPA ID No. CTD000845230)
Owner: Middleton Power LLC

Dear Mr. Latham:

As with previous years, this year NRG Northeast Generating LLC ("Northeast Genco") is continuing to provide financial assurance for post-closure costs associated with the above referenced surface impoundments, and for closure costs associated with the above referenced container storage areas via a Trust Agreement.

That agreement was established and approved by your office in 2004 when NRG Energy, Inc. was unable to provide financial assurance via the financial test method since the corporation was under bankruptcy court protection. Although NRG has emerged from bankruptcy, we are electing to maintain the Trust Agreement (# 061288-000 on record in your office) for another year. Attached is a copy of the April 15, 2009 letter from Wilmington Trust confirming that the trust account, in the amount of $1,663,648.41, remains in force.

Attached are DEP forms "Schedule A" for each facility. Please note that the estimated total cost for closure for all four sites is $1,282,858 which includes our corporate escalation factor and is based on twelve years (of the initial 30 years) remaining for groundwater monitoring at the surface impoundments. This estimate is less than trust account value.

Should you have any questions, please feel free to contact Mr. Edward Keith at (860) 343-6963.

Sincerely,

Drew Murphy
President – Eastern Region
NRG Energy, Inc.

Enclosure

Cc: E. Keith
V. Shortell
C.Karlic
L. Crofton

Bcc: D. DesRoberts
L. Ross

WILMINGTON
TRUST

Wilmington Trust Company
Rodney Square North
1100 North Market Street
Wilmington, DE 19890-0001

April 15, 2009

Luther Crofton
NRG Energy, Inc
211 Carnegie Center
Princeton, NJ 08540

Re: Devon Power LLC, Middletown Power LLC, Montville Power LLC, and Norwalk Power LLC, - Account # 061288-000

Dear Luther:

Pursuant to your request, the above referenced trust account with Wilmington Trust has a current balance of $1,663,648.41 invested in the Wilmington U.S. Government Fund Service Class Shares.

If you should have any questions, please feel free to call me.

Sincerely,

Adam B. Scozzafava
Financial Services Officer
Wilmington Trust Company
Institutional Custody & Escrow Services
ascozzafava@wilmingtontrust.com
(302) 636-6694 phone
(302) 636-4149 fax

Financial Assurance 4-15-09 w20yr_update.xls
E.M. Keith

	Devon CSA		Norwalk Harbor CSA		Middletown CSA		Montville CSA		Grand Total	
Year	IPD	Cost	IPD	Cost	IPD	Cost	IPD	Cost		Cost
1999		$ 102,678		$ 185,751		$ 94,364		$ 77,733	1999	$ 460,526
2000	2.06	$ 104,793	2.06	$ 189,577	2.06	$ 96,308	2.06	$ 79,334	2000	$ 470,013
2001	2.37	$ 107,277	2.37	$ 194,070	2.37	$ 98,590	2.37	$ 81,215	2001	$ 481,152
2002	1.13	$ 108,507	1.13	$ 196,298	1.13	$ 99,721	1.13	$ 82,148	2002	$ 486,674
2003	1.67	$ 110,319	1.67	$ 199,576	1.67	$ 101,386	1.67	$ 83,520	2003	$ 494,801
2004	2.40	$ 112,967	2.40	$ 204,366	2.40	$ 103,820	2.40	$ 85,524	2004	$ 506,677
2005	2.50	$ 115,791	2.50	$ 209,475	2.50	$ 106,415	2.50	$ 87,662	2005	$ 519,344
2006	2.50	$ 118,686	2.50	$ 214,712	2.50	$ 109,075	2.50	$ 89,854	2006	$ 532,327
2007	2.50	$ 121,653	2.50	$ 220,080	2.50	$ 111,802	2.50	$ 92,100	2007	$ 545,635
2008	2.50	**$ 124,694**	2.50	**$ 225,582**	2.50	**$ 114,597**	2.50	**$ 94,403**	2008	**$ 559,276**

=Values agreed with DEP
Submitted by letter 4/30/03

	Devon Surface Impndment		Norwalk Harbor Surface		Middletown Surface		Montville Surface	
Year	IPD	Cost	IPD	Cost	IPD	Cost	IPD	Cost
1999		$ 850,583		$ 931,835		$ 26,021		$ 22,888
2000	2.06	$ 868,105	2.06	$ 951,031	2.06	$ 26,557	2.06	$ 23,359
2001	2.37	$ 888,679	2.37	$ 973,570	2.37	$ 27,186	2.37	$ 23,913
2002	1.13	$ 468,526	1.13	$ 512,948		$ -		$ -
2003	1.67	$ 446,578	1.67	$ 488,920		$ -		$ -
2004	2.40	$ 426,810	2.40	$ 467,277		$ -		$ -
2005	2.50	$ 421,496	2.50	$ 462,066		$ -		$ -
2006	2.50	$ 415,650	2.50	$ 456,302		$ -		$ -
2007	2.50	$ 361,136	2.50	$ 395,376		$ -		$ -
2008	2.50	**$ 336,513**	2.50	**$ 387,069**		$ -		$ -

Devon Total Cost		Norwalk Harb Total Cost		Middletown Total Cost		Montville Total Cost		NE StationsTotal Cost	
Year	Cost	Year	Cost	Year	Cost	Year	Cost	Year	Cost
1999	$ 953,261	1999	$1,117,586	1999	$ 120,385	1999	$ 100,621	1999	$ 2,291,853
2000	$ 972,898	2000	$1,140,608	2000	$ 122,865	2000	$ 102,694	2000	$ 2,339,065
2001	$ 995,956	2001	$1,167,641	2001	$ 125,777	2001	$ 105,128	2001	$ 2,394,501
2002	$ 577,033	2002	$ 709,246	2002	$ 99,721	2002	$ 82,148	2002	$ 1,468,148
2003	$ 556,897	2003	$ 688,496	2003	$ 101,386	2003	$ 83,520	2003	$ 1,430,299
2004	$ 539,776	2004	$ 671,643	2004	$ 103,820	2004	$ 85,524	2004	$ 1,400,763
2005	$ 537,287	2005	$ 671,541	2005	$ 106,415	2005	$ 87,662	2005	$ 1,402,906
2006	$ 534,336	2006	$ 671,014	2006	$ 109,075	2006	$ 89,854	2006	$ 1,404,279
2007	$ 482,788	2007	$ 615,456	2007	$ 111,802	2007	$ 92,100	2007	$ 1,302,147
2008	**$ 461,207**	2008	**$ 612,651**	2008	**$ 114,597**	2008	**$ 94,403**	2008	**$ 1,282,858**

Surface Impoundment History Totals

			388128		424928		32487		38415
1994	2.38	$	397,365	2.38	$ 435,041	2.38	$ 33,260	2.38	$ 39,329
1995	4.75	$	416,240	4.75	$ 455,706	4.75	$ 34,840	4.75	$ 41,197
1996	1.88	$	424,066	1.88	$ 464,273	1.88	$ 35,495	1.88	$ 41,972
1997	1.86	$	431,953	1.86	$ 472,908	1.86	$ 36,155	1.86	$ 42,753
1998	1.16	$	436,964	1.16	$ 478,394	1.16	$ 36,575	1.16	$ 43,249
1999	1.45	$	443,300	1.45	$ 485,331	1.45	$ 37,105	1.45	$ 43,876
2000	2.10	$	452,609	2.10	$ 495,523	2.10	$ 37,884	2.10	$ 44,797
2001	2.37	$	463,336	2.37	$ 507,267	2.37	$ 38,782	2.37	$ 45,859
2002	1.13	$	446,578	1.13	$ 512,948		$ -		$ -
2003	1.67	$	454,036	1.67	$ 488,920		$ -		$ -
2004	2.40	$	426,810	2.40	$ 467,277		$ -		$ -
2005	2.50	$	421,496	2.50	$ 462,066		$ -		$ -
2006	2.50	$	415,650	2.50	$ 456,302		$ -		$ -
2007	2.50	$	361,136	2.50	$ 395,376		$ -		$ -
2008	2.50	$	336,513	2.50	$ 387,069		$ -		$ -

Financial Assurance 4-15-09 w20yr_update.xls
E.M. Keith

Norwalk Harbor Surface Impoundment

NH Calculation for 2002 assumes 16 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$13,444	$13,114	$26,558
	% escala	years			
1994	2.38	16	$220,223	$214,818	$435,041
1995	4.75	16	$230,684	$225,022	$455,706
1996	1.88	16	$235,021	$229,252	$464,273
1997	1.86	16	$239,392	$233,516	$472,908
1998	1.16	16	$242,169	$236,225	$478,394
1999	1.44	16	$245,657	$239,627	$485,283
2000	2.1	16	$250,815	$244,659	$495,474
2001	2.37	16	$256,760	$250,457	$507,217
2002	1.13	16	$259,661	$253,287	$512,948

NH Calculation for 2003 assumes 15 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$13,444	$13,114	$26,558
	% escala	years			
1994	2.38	15	$206,460	$201,392	$407,851
1995	4.75	15	$216,266	$210,958	$427,224
1996	1.88	15	$220,332	$214,924	$435,256
1997	1.86	15	$224,430	$218,921	$443,352
1998	1.16	15	$227,034	$221,461	$448,495
1999	1.44	15	$230,303	$224,650	$454,953
2000	2.1	15	$235,139	$229,368	$464,507
2001	2.37	15	$240,712	$234,804	$475,516
2002	1.13	15	$243,432	$237,457	$480,889
2003	1.67	15	$247,498	$241,422	$488,920

NH Calculation for 2004 assumes 14 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$13,444	$13,114	$26,558
	% escala	years			
1994	2.38	14	$192,696	$187,966	$380,661
1995	4.75	14	$201,849	$196,894	$398,743
1996	1.88	14	$205,643	$200,596	$406,239
1997	1.86	14	$209,468	$204,327	$413,795
1998	1.16	14	$211,898	$206,697	$418,595
1999	1.44	14	$214,949	$209,673	$424,623
2000	2.1	14	$219,463	$214,076	$433,540
2001	2.37	14	$224,665	$219,150	$443,815
2002	1.13	14	$227,203	$221,626	$448,830
2003	1.67	14	$230,998	$225,328	$456,325
2004	2.4	14	$236,542	$230,735	$467,277

NH Calculation for 2005 assumes 13 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$13,444	$13,114	$26,558
	% escala	years			
1994	2.38	13	$192,696	$174,539	$367,235
1995	4.75	13	$201,849	$182,830	$384,679
1996	1.88	13	$205,643	$186,267	$391,911
1997	1.86	13	$209,468	$189,732	$399,200
1998	1.16	13	$211,898	$191,933	$403,831
1999	1.44	13	$214,949	$194,697	$409,646
2000	2.1	13	$219,463	$198,785	$418,249
2001	2.37	13	$224,665	$203,496	$428,161
2002	1.13	13	$227,203	$205,796	$432,999
2003	1.67	13	$230,998	$209,233	$440,230
2004	2.4	13	$236,542	$214,254	$450,796
2005	2.5	13	$242,455	$219,611	$462,066

NH Calculation for **2006** assumes 12 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$13,444	$13,114	$26,558
	% escala	years			
1994	2.38	12	$192,696	$161,113	$353,809
1995	4.75	12	$201,849	$168,766	$370,615
1996	1.88	12	$205,643	$171,939	$377,582
1997	1.86	12	$209,468	$175,137	$384,605
1998	1.16	12	$211,898	$177,169	$389,067
1999	1.44	12	$214,949	$179,720	$394,669
2000	2.1	12	$219,463	$183,494	$402,957
2001	2.37	12	$224,665	$187,843	$412,508
2002	1.13	12	$227,203	$189,965	$417,169
2003	1.67	12	$230,998	$193,138	$424,136
2004	2.4	12	$236,542	$197,773	$434,315
2005	2.5	12	$242,455	$202,718	$445,173
2006	2.5	12	$248,517	$207,785	$456,302

Devon Surface Impoundment

Calculation for 2002 assumes 16 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	16	$194,112	$203,253	$397,365
1995	4.75	16	$203,333	$212,907	$416,240
1996	1.88	16	$207,155	$216,910	$424,066
1997	1.86	16	$211,009	$220,945	$431,953
1998	1.16	16	$213,456	$223,508	$436,964
1999	1.44	16	$216,530	$226,726	$443,256
2000	2.1	16	$221,077	$231,487	$452,565
2001	2.37	16	$226,317	$236,974	$463,290
2002	1.13	16	$228,874	$239,651	$468,526

Calculation for 2003 assumes 15 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	15	$181,980	$190,550	$372,530
1995	4.75	15	$190,625	$199,601	$390,225
1996	1.88	15	$194,208	$203,353	$397,562
1997	1.86	15	$197,821	$207,136	$404,956
1998	1.16	15	$200,115	$209,538	$409,654
1999	1.44	15	$202,997	$212,556	$415,553
2000	2.1	15	$207,260	$217,019	$424,279
2001	2.37	15	$212,172	$222,163	$434,335
2002	1.13	15	$214,569	$224,673	$439,243
2003	1.67	15	$218,153	$228,425	$446,578

DV Calculation for 2004 assumes 14 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	14	$169,848	$177,846	$347,695
1995	4.75	14	$177,916	$186,294	$364,210
1996	1.88	14	$181,261	$189,796	$371,057
1997	1.86	14	$184,633	$193,327	$377,959
1998	1.16	14	$186,774	$195,569	$382,343
1999	1.44	14	$189,464	$198,385	$387,849
2000	2.1	14	$193,443	$202,551	$395,994
2001	2.37	14	$198,027	$207,352	$405,379
2002	1.13	14	$200,265	$209,695	$409,960
2003	1.67	14	$203,609	$213,197	$416,806
2004	2.4	14	$208,496	$218,314	$426,810

DV Calculation for 2005 assumes 13 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	13	$169,848	$165,143	$334,991
1995	4.75	13	$177,916	$172,987	$350,904
1996	1.88	13	$181,261	$176,239	$357,501
1997	1.86	13	$184,633	$179,518	$364,150
1998	1.16	13	$186,774	$181,600	$368,374
1999	1.44	13	$189,464	$184,215	$373,679
2000	2.1	13	$193,443	$188,084	$381,526
2001	2.37	13	$198,027	$192,541	$390,568
2002	1.13	13	$200,265	$194,717	$394,982
2003	1.67	13	$203,609	$197,969	$401,578
2004	2.4	13	$208,496	$202,720	$411,216
2005	2.5	13	$213,708	$207,788	$421,496

DV Calculation for **2006** assumes 12 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	12	$169,848	$152,440	$322,288
1995	4.75	12	$177,916	$159,681	$337,597
1996	1.88	12	$181,261	$162,683	$343,944
1997	1.86	12	$184,633	$165,709	$350,341
1998	1.16	12	$186,774	$167,631	$354,405
1999	1.44	12	$189,464	$170,045	$359,508
2000	2.1	12	$193,443	$173,616	$367,058
2001	2.37	12	$198,027	$177,730	$375,757
2002	1.13	12	$200,265	$179,739	$380,003
2003	1.67	12	$203,609	$182,740	$386,349
2004	2.4	12	$208,496	$187,126	$395,622
2005	2.5	12	$213,708	$191,804	$405,512
2006	***2.5***	12	$219,051	$196,599	$415,650

DV Calculation for **2007** assumes 11 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	11	$133,452	$139,736	$273,189
1995	4.75		$139,791	$146,374	$286,165
1996	1.88		$142,419	$149,126	$291,545
1997	1.86		$145,068	$151,899	$296,968
1998	1.16		$146,751	$153,661	$300,413
1999	1.44		$148,864	$155,874	$304,739
2000	2.1		$151,991	$159,148	$311,138
2001	2.37		$155,593	$162,919	$318,512
2002	1.13		$157,351	$164,760	$322,111
2003	1.67		$159,979	$167,512	$327,491
2004	2.4		$163,818	$171,532	$335,350
2005	2.5		$167,914	$175,820	$343,734
2006	2.5		$172,111	$180,216	$352,327
2007	***2.5***		$176,414	$184,721	$361,136

DV Calculation for **2008** assumes 10 yrs monitoring

			Material	Labor	Total
Annual Cost in 1993 Dollars			$11,850	$12,408	$24,258
	% escala	years			
1994	2.38	10	$121,320	$127,033	$248,353
1995	4.75		$127,083	$133,067	$260,150
1996	1.88		$129,472	$135,569	$265,041
1997	1.86		$131,880	$138,090	$269,971
1998	1.16		$133,410	$139,692	$273,102
1999	1.44		$135,331	$141,704	$277,035
2000	2.1		$138,173	$144,680	$282,853
2001	2.37		$141,448	$148,109	$289,556
2002	1.13		$143,046	$149,782	$292,828
2003	1.67		$145,435	$152,284	$297,719
2004	2.4		$148,926	$155,938	$304,864
2005	2.5		$152,649	$159,837	$312,486
2006	2.5		$156,465	$163,833	$320,298
2007	2.5		$160,377	$167,929	$328,305
2008	***2.5***		$164,386	$172,127	$336,513

GENERAL DOCUMENTATION

This worksheet is to provide spreadsheet documentation in accordance to Sarbanes Oxley Act Section 404. This information should be reviewed and updated by the owner of the workbook on a quarterly basis at a minimum, and more frequently, if necessary.

Filename and path:	C:\Documents and Settings\L01Cal\Local Settings\Temporary Internet Files\OLK56\[Financial Assurance 4-15-09 w20yr_update (3).xls]General Documentation
Owner:	
Date this documentation last reviewed:	

Business Purpose: Describe the business purpose of the workbook.	
Other Users of Workbook: List users with read/write access.	
List users with read-only access.	
List any others who use workbook (I.e., users who receive an email copy or print-out).	
Data Flow: List sources of input to the workbook.	
List the uses of the output of the workbook.	
Describe the links TO and FROM the workbook.	
Describe the design layout of the workbook (I.e., various worksheets and their uses).	
Input Controls: Describe the checks & balances within the workbook prior to publishing.	
Describe how the input and/or calculations are reconciled to outside source data.	
Data Security & Integrity: Are critical cells & formulas in the workbook locked or password protected?	
Change Control: Has workbook been changed since last period (quarterly or monthly)? If so, document the change, testing performed, and manager approval. Approval should be sent via email and archived, or manager sign-off on print-out of output.	
Logic Inspection: When did this workbook last undergo logic inspection with approval by manager?	

If the workbook contains complex formulas, macros, or other features that need to be documented, identify the location of the documentation.
Note, ideally documentation should be maintained in the workbook, however, documentation may also exist in a Word document, etc.

Complex formulas	
Macros	
Assumptions used for forecasting, estimates, modeling, etc.	
Additional documentation, if necessary	
Overall Analytics: Have the workbook calculations been analyzed for errors?	
Have the results of formulas been independently calculated and compared to the workbook for accuracy?	
If known, describe how the workbook was developed & if Software Development Life Cycle was used.	
Additional Comments: (add rows as necessary)	

Trust Agreement - Schedule A

Pursuant to Section 2 of this Agreement, the following are the facilities for which financial assurance is being provided through the Trust established by this Agreement:

EPA ID No: CTD000845248

Facility Name: Devon Station:

Address: Naugatuck Ave., Milford, CT 06460

Total Closure Cost Estimate: 124694

Total Post-closure Cost Estimate: 336513

Bank Account No. Wilmington Trust, no.061288-000

List all RCRA financial assurance obligations by type covered by this instrument:

TSD Closure

1. Container Storage Area - Closure - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

TSD Post-Closure Care

1. Surface Impoundment ground water monitoring - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

Site-wide Corrective Action

[Insert Permit or Enforcement Action Number] - Permit [Insert Cost Estimate]

[*If this Agreement demonstrates financial assurance for more than one facility, provide the name, address, and closure and/or post-closure and corrective action estimates for each facility or additional unit by copying and pasting the above fields here.*]

Trust Agreement - Schedule A

Pursuant to Section 2 of this Agreement, the following are the facilities for which financial assurance is being provided through the Trust established by this Agreement:

EPA ID No: CTD000845230

Facility Name: Middletown Station:

Address: River Rd, Middletown, CT 06457

Total Closure Cost Estimate: 114597

Total Post-closure Cost Estimate:

Bank Account No. Wilmington Trust, no.061288-000

List all RCRA financial assurance obligations by type covered by this instrument:

TSD Closure

1. Container Storage Area - Closure - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

TSD Post-Closure Care

1. [Description of TSD Unit] - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

Site-wide Corrective Action

[Insert Permit or Enforcement Action Number] - Permit [Insert Cost Estimate]

[*If this Agreement demonstrates financial assurance for more than one facility, provide the name, address, and closure and/or post-closure and corrective action estimates for each facility or additional unit by copying and pasting the above fields here.*]

Trust Agreement - Schedule A

Pursuant to Section 2 of this Agreement, the following are the facilities for which financial assurance is being provided through the Trust established by this Agreement:

EPA ID No: CTD049181654

Facility Name: Montville Station:

Address: Lathrop Rd, Uncasville, CT 06382

Total Closure Cost Estimate: 94403

Total Post-closure Cost Estimate:

Bank Account No. Wilmington Trust, no.061288-000

List all RCRA financial assurance obligations by type covered by this instrument:

TSD Closure

1. Container Storage Area - Closure - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

TSD Post-Closure Care

1. [Description of TSD Unit] - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

Site-wide Corrective Action

[Insert Permit or Enforcement Action Number] - Permit [Insert Cost Estimate]

[*If this Agreement demonstrates financial assurance for more than one facility, provide the name, address, and closure and/or post-closure and corrective action estimates for each facility or additional unit by copying and pasting the above fields here.*]

Trust Agreement - Schedule A

Pursuant to Section 2 of this Agreement, the following are the facilities for which financial assurance is being provided through the Trust established by this Agreement:

EPA ID No: CTD000845214

Facility Name: Norwalk Harbor Station:

Address: Manresa Island Ave., South Norwalk, CT 06854

Total Closure Cost Estimate: 225582

Total Post-closure Cost Estimate: 387069

Bank Account No. Wilmington Trust, no.061288-000

List all RCRA financial assurance obligations by type covered by this instrument:

TSD Closure

1. Container Storage Area - Closure - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

TSD Post-Closure Care

1. Surface Impoundment ground water monitoring - Interim Status
2. [Description of TSD Unit] - Interim Status
3. [Description of TSD Unit] - Interim Status
4. [Description of TSD Unit] - Interim Status
5. [Description of TSD Unit] - Interim Status
6. [Description of TSD Unit] - Interim Status
7. [Description of TSD Unit] - Interim Status
8. [Description of TSD Unit] - Interim Status

Site-wide Corrective Action

[Insert Permit or Enforcement Action Number] - Permit [Insert Cost Estimate]

[*If this Agreement demonstrates financial assurance for more than one facility, provide the name, address, and closure and/or post-closure and corrective action estimates for each facility or additional unit by copying and pasting the above fields here.*]